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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

PACIFIC OFFICE AUTOMATION, INC., an
Oregon corporation,

Plaintiff,

v.

PITNEY BOWES, INC., a Delaware
corporation; PITNEY BOWES GLOBAL
FINANCIAL SERVICES, LLC, a Delaware
limited liability company; THE PITNEY
BOWES BANK, INC., a federal banking
institution; WHEELER FINANCIAL FROM
PITNEY BOWES, INC., a Delaware corp.;

Defendants.

Case No. 3:20-cv-00651-AC

**PLAINTIFF'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO
DEFENDANTS' MOTIONS TO
COMPEL AND DEFENDANTS'
MOTION TO MODIFY
STIPULATED
PROTECTIVE ORDER**

LOCAL RULE 7-1 CERTIFICATION

Undersigned counsel certifies that counsel conferred prior to this motion, and counsel for Defendants has indicated no opposition to Plaintiff's request for additional time to respond to the Defendants' Motions to Compel (Docs. 67 and 71) and Defendants' Motion to Modify Stipulated Protective Order (Doc. 69).

MOTION

Pursuant to L.R. 16-3 and Fed. R. Civ. P. 6(b)(1)(A), Plaintiff moves this Court for an order briefly extending the time to respond to Defendants' Motions to Compel (Docs. 67 and 71) and their Motion to Modify Stipulated Protective Order (Doc. 69). Plaintiff seeks to file its Responses no later than **Wednesday, August 18, 2021**. The Responses are currently due August 16, 2021.

This motion is made in good faith and not for purposes of delay. Plaintiff seeks a few additional days because the deadlines in this matter have overlapped with ongoing preparation for and conducting of depositions in this same case. This is Plaintiff's first request for an extension, and Defendants' counsel has stated a "no opposition" position.

For the foregoing reasons, Plaintiff requests that the Court allow it to file its Responses to Docs. 67, 69 and 71 by (and including) August 18, 2021.

DATED this 16th day of August, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served upon all counsel of record to this matter on this 16th day of August, 2021, via the Court's CM/ECF System.

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